

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALEXANDER MASHINSKY and RONI
COHEN-PAVON,

Defendants.

Case No. 23 Cr. 347 (JGK)

**REPLY DECLARATION OF MICHAEL F. WESTFAL IN FURTHER SUPPORT OF
ALEXANDER MASHINSKY'S MOTION TO PRESERVE THE TESTIMONY OF
MATERIAL WITNESSES RESIDING OUTSIDE THE UNITED STATES**

Pursuant to 28 U.S.C. § 1746, I, Michael F. Westfal, declare as follows:

1. I am an attorney admitted to practice before this Court and counsel with the law firm Mukasey Young LLP.

2. I am a counsel of record for Defendant Alexander Mashinsky in the above-captioned action.

3. I submit this reply declaration in further support of Mr. Mashinsky's motion to preserve the testimony of material witnesses residing outside the United States.

4. Attached as Exhibit 57 (and filed under seal) are excerpts of a video stamped as SDNY_R05_00000001.

5. Attached as Exhibit 58 is a copy of the Mutual Legal Assistance Treaty Between the United States of America and Israel signed on January 26, 1998 and entered into force May 25, 1999, and retrieved from the Department of State website at: <https://www.state.gov/wp-content/uploads/2019/02/12925-Israel-Law-Enforcement-MLAT-1.26.1998.pdf>.

6. Attached as Exhibit 59 is a copy of the Mutual Legal Assistance Treaty Between the United States of America and the Netherlands signed on September 29, 2004 and entered into

force February 1, 2010, and retrieved from the Department of State website at:

<https://www.state.gov/wp-content/uploads/2019/02/10-201.41-Netherlands-EU-Mutual-Legal-Assistance-Treaty.pdf>.

7. Attached as Exhibit 60 is a copy of the Mutual Legal Assistance Treaty Between the United States of America and Germany signed on October 14, 2003 and entered into force October 18, 2009, and retrieved from the Department of State website at:

<https://www.state.gov/wp-content/uploads/2019/02/09-1018-Germany-MLAT.pdf>.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 4, 2024

/s/ Michael F. Westfal
Michael F. Westfal

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